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21 *Counsel for Calpine Corporation, et al.*

22
23 **UNITED STATES DISTRICT COURT**
24 **NORTHERN DISTRICT OF CALIFORNIA**
25 **SAN FRANCISCO DIVISION**

26 In re:
27
28 PG&E Corporation, Pacific Gas & Electric
Company,
Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

* All papers shall be filed in the Lead Case,
No. 19-30088 (DM)

Chapter 11

Case No. 19-30088 (DM)

(Lead Case)
(Jointly Administered)

**DECLARATION OF NO RESPONSE
TO MOTION FOR AN ORDER
AUTHORIZING THE WITHDRAWAL
OF COUNSEL**

1 I, Michael P. Esser, say and declare as follows:

2 1. I am an individual over 18 years of age and am competent to make this Declaration.

3 2. I am an attorney at law duly admitted to practice before the United States District Court for
4 the Northern District of California.

5 3. I am currently an attorney employed by the law firm of Kirkland & Ellis LLP, counsel of
6 record for Calpine Corporation ("Calpine").

7 4. On January 28, 2021, Calpine filed the Notice of Motion and Motion for an Order
8 Authorizing the Withdrawal of Counsel [Docket No. 10032].

9 5. On January 28, 2021, Calpine served a copy of the Notice of Motion and Motion for an
10 Order Authorizing the Withdrawal of Counsel on required parties using the methods of service identified
11 on the Certificate of Service [Docket No. 10033].

12 6. Pursuant to Bankruptcy Local Rule 9014-1(3)(A), the Notice of Motion provides that the
13 deadline to file and served a written response for hearing is 21 days after the date of service of the Motion.

14 7. More than 21 days have passed after service of the Notice of Motion and Motion for an
15 Order Authorizing the Withdrawal of Counsel.

16 8. No response or request for hearing was timely served on the firm via Notice of Electronic
17 filing or at the street address, mail address, or facsimile number specified on the Notice of Motion.

18 9. Based on the foregoing and pursuant to Bankruptcy Local Rule 9014-1(3)(A), a hearing
19 has not been requested and is not required.

20 10. Calpine requests that the court grant the Motion and enter an order without a hearing.
21

22 I declare under penalty of perjury in accordance with the laws of the State of California that the
23 foregoing is true and correct. Executed on February 24, 2021 at San Francisco, California.
24
25
26
27
28

1 DATED: February 24, 2021

KIRKLAND & ELLIS LLP

2
3 By: /s/ Michael P. Esser

4 Michael P. Esser

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